

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No. 5:14-cv-05484-EJD
5:14-cv-05591-EJD
5:14-cv-05621-EJD

**[PROPOSED] ORDER APPOINTING
INTERIM CO-LEAD COUNSEL**

**Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

5:14-cv-05484-EJD
5:14-cv-05591-EJD
5:14-cv-05621-EJD

1 1. Pursuant to Federal Rule of Civil Procedure 23(g)(3), the Court hereby appoints the
 2 following counsel as Plaintiffs' Interim Co-Lead Class Counsel: Berger & Montague, P.C.; Cohen
 3 Milstein Sellers & Toll PLLC; and the Joseph Saveri Law Firm, Inc.

4 2. Plaintiffs' Interim Co-Lead Class Counsel shall be responsible for performing work to
 5 advance the litigation for the common benefit of all plaintiffs and proposed class members, including all
 6 plaintiffs and proposed class members in related actions subsequently filed in or transferred to this
 7 District (collectively, "Plaintiffs"). Plaintiffs' Interim Co-Lead Class Counsel's responsibilities for
 8 coordinating and organizing Plaintiffs in the conduct of this litigation shall include:

9 a. Organizing and conducting pretrial law and motion practice, including class
 10 certification;

11 b. Organizing and conducting discovery, including the conduct of all discovery on
 12 behalf of Plaintiffs consistent with Fed. R. Civ. Pro 26;

13 c. Acting as spokesperson at pretrial conferences;

14 d. Entering into stipulations with opposing counsel, as necessary, for the conduct of
 15 litigation;

16 e. Consulting with and retaining experts, as necessary;

17 f. Conducting trial and post-trial proceedings;

18 g. Acting as spokesperson at pretrial conferences;

19 h. Entering into stipulations with opposing counsel, as necessary, for the conduct of
 20 the litigation;

21 i. Encouraging cooperation and efficiency among all Plaintiffs' counsel;

22 j. Calling meetings of Plaintiffs' counsel, when appropriate;

23 k. Making all work assignments to Plaintiffs' counsel;

24 l. Monitoring the activities of all Plaintiffs' counsel to ensure that the litigation is
 25 conducted effectively, efficiently, and economically;

26 m. Ensuring that schedules are met, and that unnecessary, duplicative, or
 27 unproductive expenditures of time and expense are avoided;

28 n. Negotiating with defense counsel with respect to settlement and other matters, if

1 and as appropriate; and

2 o. In the event of settlement or judgment in Plaintiffs' favor, applying to the Court for,
3 *inter alia*, attorneys' fees and reimbursement of costs, and allocating any fees and costs awarded by
4 the Court to Plaintiffs' co-counsel.

5 4. Plaintiffs' Interim Co-Lead Counsel shall also be the contact between plaintiffs' counsel
6 and counsel for the Defendant, as well as the spokespersons for plaintiffs' counsel, including plaintiffs'
7 counsel in related actions subsequently filed in or transferred to this District.

8 5. No motion, request for discovery, or other pretrial proceedings shall be initiated or filed by
9 any Plaintiff except through Interim Co-Lead Counsel.

10 **IT IS SO ORDERED.**

11 Dated:

HON. EDWARD J. DAVILA
United States District Judge